Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of the Pleading Cycle Established for Eligible Services List for Universal Service Mechanism for Schools and Libraries	)))	CC Docket No. 02-6

COMMENTS OF GENERAL COMMUNICATION, INC.

On July 21, 2006 the Commission invited comment on USAC's proposed list of eligible services.[1] General Communication, Inc. ("GCI") appreciates the opportunity to comment and commends USAC for the timely preparation of the list. GCI suggests one modification that is necessary to make the list of supported services consistent with the technical reality of how GCI provides services to school districts in rural Alaska. If implemented, the change will allow GCI to provide services more cost efficiently to its customers.

The description of eligible telecommunications services for schools and libraries excludes scheduling services.[2] A scheduling component is an integral part of the connecting telecommunications services provided by GCI to its customers in rural Alaska. Rural school districts have effectively used video teleconferences to share curriculum resources between schools and districts in

[1] *Pleading Cycle Established for Eligible Services List for Universal Service Mechanism for Schools and Libraries*, Released July 21, 2006, FCC 06-109, CC Docket No. 02-6.
[2] Schools and Libraries Eligible Services List for Funding Year 2007, page 6.

remote locations over supported telecommunications links. To comply with federal No Child Left Behind Standards, high school classes must be taught by highly qualified teachers. In a school with less than 50 students in kindergarten through 12th grade, it is not possible to have a qualified teacher to cover all subjects in a high school curriculum on site. To avoid forcing the students to leave their village homes to complete their high school education, several school districts in Alaska have effectively used video teleconferences to enable a highly qualified teacher located in the school district headquarters to teach classes that include high school students in multiple village school locations. Use of this technology enables the students to interact with and learn from students in other villages and enables the school district to cost effectively comply with federal educational standards.

The technical aspect of setting up these video links are complex and time consuming if done manually, but can be accomplished efficiently with scheduling software. To establish a video teleconference call without scheduling software, a user must manually dial into a multipoint conference unit. The dialing system for video teleconference calls is not as universal as it is with telephone calls. Each manufacturer has a different dialing interface, and they may have different remote controls and layouts of buttons to learn how to use. Dialing is by IP address or some non-standard, non-universal dialing plan and is more than likely unique from customer to customer. Therefore, without software

scheduling capability, the process of establishing a video teleconference call requires training, time and coordination amongst multiple endpoints.

Using software, the process of establishing a video teleconference is easier, faster and more reliable for customers. Software enables the calls from several locations to be set up and linked at a multipoint conference unit without action by the end users. Multipoint conference units operate like phone switches. They are network devices that serve more than one customer that are usually not physically accessible to the customer. When a customer wants to have a multipoint videoconference, the conference is created on the multipoint conference unit by a GCI video teleconference operator or administrator. This system enables both the physical resource of the multipoint conference unit and the technical expertise of the teleconference operator to be shared amongst several customers and obviates the need for the customer to purchase their own multipoint conference unit. Scheduling is usually web-based, allowing customers to do it directly. A web-based interface reduces the overall costs of providing the service to the customer. The scheduling program communicates with the multiple conference unit and endpoints to automatically start and end conferences and eliminate the need for a trained user at each endpoint to coordinate and establish the video teleconference. This increases reliability for customers and reduces customers' costs.

To allow scheduling software to be included as a supported service when it is an integral part of the eligible telecommunications service GCI suggests that the first full paragraph on the top of page 6 be modified by deleting the words "a scheduling service or" from the last sentence and add a sentence that reads: "A basic scheduling tool for distance learning, video service or interactive television is eligible for support if it is an integrated component of the service." Scheduling software is an integral part of the telecommunications service that GCI offers to its schools and libraries customers in rural Alaska. Offering scheduling services as an integrated part of video teleconference service makes them more cost efficient and reliable for educational customers. GCI requests that it be added to the list of eligible services when it is an integral part of the service.

Respectfully Submitted,

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